



DISABILITY AND COMMUNICATION ACCESS BOARD

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INTERPRETIVE OPINION

Pursuant to §103-50, Hawaii Revised Statutes (HRS), all buildings and facilities constructed by, or on behalf of the State or any county, shall conform to the 2004 Americans with Disabilities Act Accessibility Guidelines (2004 ADAAG) and amendments. In accordance to HRS §103-50 and Chapter 11-217, Hawaii Administrative Rules, the Disability and Communication Access Board has authority to issue interpretive opinions to HRS §103-50 design standards.

Docket: **DCAB 2011-04: Does door hardware with the characteristic functions equivalent to ANSI F07, F30, F86 and F87 comply with ADAAG section 309.4 and 404.2.7?**

Summary: The door hardware functions listed require someone to hold and turn a key with one hand as they push or pull the door hardware with the other as the level is never operable; it is always fixed or rigid. In these instances the key acts as an operating device since the key must remain in the lock, in the turned position, in order for the door to be opened.

The 2004 ADAAG states that “operable parts”, which includes door hardware, “shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist.” The hardware functions in question requires two hands to operate and the key must be turned and held in the turned position for the door to be opened.

Both the U.S. Access Board and the Department of Justice have stated that while keys are not addressed in the guidelines, hardware that requires two hands to operate every time you open a door, does not comply with the guidelines.

Ruling: For buildings or facilities subject to HRS §103-50,

ADAAG Section 404.2.7 Door & Gate Hardware

Door hardware with a hardware function that requires two hands to operate, one to hold, pinch and twist a key to disengage the latch bolt, and one hand to open the door at the same time, does not comply with ADAAG section 309.4 and 404.2.7.

[Rul: 01/03/2011] (Auth and Imp: HRS §103-50)

If you have any questions or comments regarding this ruling, please call us at 586-8121.

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